

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FOUNDATION AGAINST INTOLERANCE AND RACISM, INC.)	Civil Action No. 2:24-cv-01770-JHC
)	
Plaintiff,)	
)	
v.)	STIPULATED MOTION AND ORDER TO EXTEND DEADLINE TO RESPOND TO MOTION TO DISMISS AND CONTINUE INITIAL SCHEDULING DATES
)	
STEVE WALKER, in his official capacity as Executive Director of the Washington State Housing Finance Commission,)	
)	Noted on motion calendar Dec. 30, 2024
Defendant.)	

Plaintiff Foundation Against Intolerance and Racism Inc. (“Plaintiff”) and Defendant Steve Walker, in his official capacity as Executive Director of the Washington State Housing Finance Commission (“Defendant”) jointly move the Court to extend the deadlines for filing an Opposition to and Reply to Opposition to Defendant’s Motion to Dismiss (Dkt. No. 14), and continue initial scheduling dates (Dkt. No. 13). In support of this Stipulated Motion, the Parties state the following:

1 1. Plaintiff filed the Complaint in this matter on October 29, 2024. Dkt.
2 No. 1.

3 2. On December 17, 2024, the Court entered an order establishing Initial
4 Scheduling Dates, setting the deadline for Initial Disclosures pursuant to FRCP
5 26(a)(1) for January 14, 2025, and submission of the Combined Joint Status Report
6 and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f) for
7 January 21, 2025. Dkt. No. 13.

8 3. On December 20, 2021, Defendant filed a Motion to Dismiss Plaintiff's
9 Complaint, causing the deadline to file an Opposition to be January 10, 2025, and
10 Reply deadline of January 17, 2025. The noting date for the Motion to Dismiss is
11 January 17, 2025.

12 4. On December 23, 2024, the Parties completed the FRCP 26(f)
13 Conference, jointly conferred, and hereby jointly request a two-week extension for
14 Plaintiff to respond to the Motion to Dismiss to January 24, 2025, and extension for
15 Defendant to file his Reply to February 7, 2025, given the December holidays
16 impacting the current deadline and limited availability of Plaintiff's counsel during
17 that timeframe.

18 5. In addition, the Parties request that the deadlines for Initial
19 Disclosures and submission of the Combined Joint Status Report and Discovery
20 Plan be continued in light of Defendant's Motion to Dismiss.

21 6. For the foregoing reasons, the Parties therefore jointly and respectfully
22 request that the Court extend Opposition and Reply deadlines to the Motion to
23 Dismiss, and modify the Initial Scheduling dates in this matter as follows:

Event	Revised Date
Opposition to Defendant's Motion to Dismiss	January 24, 2025
Reply to Motion to Dismiss	February 7, 2025

Initial Disclosures	Date determined by the Court following decision on Motion to Dismiss
Combined Joint Status Report and Discovery Plan	Date determined by the Court following decision on Motion to Dismiss

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

Respectfully submitted this 30th day of December, 2024.

<p>PACIFIC LEGAL FOUNDATION <i>Attorneys for Plaintiff FAIR</i></p> <p><u>s/ Andrew R. Quinio</u> ANDREW R. QUINIO California Bar # 288101 * 555 Capitol Mall, Suite 1290 Sacramento, California 95814 Telephone: (916) 419-7111 Fax: (916) 419-7747 AQuinio@pacificlegal.org</p> <p><u>s/ Chris Barnewolt</u> CHRIS BARNEWOLT D.C. Bar # 90020413 * 3100 Clarendon Blvd., Suite 1000 Arlington, Virginia 22201 Telephone: (202) 888-6881 CBarnewolt@pacificlegal.org</p> <p><u>s/ Wesley Hottot</u> WESLEY HOTTOT, WSBA # 47539 1425 Broadway, #429 Seattle, Washington 98122 Telephone: (425) 576-0484 Fax: (916) 419-7747 WHottot@pacificlegal.org</p> <p>* <i>Pro hac vice</i></p>	<p>PACIFICA LAW GROUP <i>Attorneys for Defendant Steve Walker</i></p> <p><u>s/ Ai-Li Chiong-Martinson</u> [signature added per authority] Ai-Li Chiong-Martinson <u>s/ Paul Lawrence</u> [signature added per authority] Paul Lawrence <u>s/ Jamie Lisagor</u> [signature added per authority] Jamie Lisagor <u>s/ Erica Coray</u> [signature added per authority] Erica Coray 1191 2nd Avenue, Suite 2000 Seattle, WA 98101 Telephone: (206) 245-1700 ai-li.chiong-martinson@pacificlawgroup.com Paul.Lawrence@pacificlawgroup.com Jamie.Lisagor@pacificlawgroup.com Erica.Coray@pacificlawgroup.com</p>
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ORDER

The Parties jointly moved the Court for an extension of deadlines to Oppose and Reply to the Opposition to the Motion to Dismiss and other deadlines. Those deadlines are extended to the following dates:

Event	Revised Date
Opposition to Defendant's Motion to Dismiss	January 25, 2025
Reply to Motion to Dismiss	February 7, 2025
Initial Disclosures	TBD following decision on Motion to Dismiss
Combined Joint Status Report and Discovery Plan	TBD following decision on Motion to Dismiss

PURSUANT TO STIPULATION IT IS SO ORDERED.

DATED this 31st day of December, 2024.



JOHN H. CHUN

UNITED STATES DISTRICT JUDGE